

REMARKS

I. Introduction

Applicants and Applicants' representative would like to thank Examiner Le for the indication of allowance of claims 4-19.

For the reasons set forth below, Applicants respectfully submit that remaining claim 1 is patentable over the cited prior art references.

II. The Rejection Of Claim 1 Under 35 U.S.C. § 102

Claim 1 is rejected under 35 U.S.C. § 102(e) as being anticipated by USP No. 6,738,281 to Yokozeki. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1 recites in-part a first ferroelectric capacitor which connects the *second data input/output line* to the first node, and a second ferroelectric capacitor which connects the *first data input/output line* to the second node.

In the pending rejection, the Examiner reads the input node N of Yokozeki as the claimed first node, the input node NX as the claimed second node and the bit line BLX as the claimed second input/output line (see, page 3 of Office Action). However, in doing so, it is clear that the alleged first ferroelectric capacitor 3a does *not* connect the input node N to the alleged second data input/output line or bit line BLX, as readily illustrated in Fig. 1. Similarly, the reasoning with respect to the connection of the claimed second ferroelectric capacitor is flawed, because the alleged second ferroelectric capacitor 3b does *not* connect the alleged first data input/output line or bit line BL to the input node NX. Rather, the ferroelectric capacitor 3a connects the *plate voltage* PL to the input node N, and the ferroelectric capacitor 3b connects the *plate voltage* PL to the input node NX.

Accordingly, as anticipation under 35 U.S.C. § 102 requires that each element of the claim in issue be found, either expressly described or under principles of inherency, in a single prior art reference, *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983), and at a minimum, Yokozeki fails to disclose or suggest the foregoing claim elements, it is clear that Yokozeki does not anticipate claim 1.

III. Conclusion

Accordingly, it is urged that the application is in condition for allowance, an indication of which is respectfully solicited.

If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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